



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

DEC 22 2009

CERTIFIED MAIL 7007 1490 0001 0118 6847  
RETURN RECEIPT REQUESTED

Mr. Don Cope  
President and Chief Executive Officer  
Dalton Utilities  
1200 VD Parrott Junior Parkway  
Dalton, Georgia 30721

Re: Information Request - Section 308 of the Clean Water Act  
Drinking Water Well Survey Report  
Drinking Water Well Monitoring Report  
Composted Biosolids Monitoring Plan  
Compost Use Review Report

Dear Mr. Cope:

This office is in receipt of the "Drinking Water Well Survey Report," dated November 4, 2009, the "Drinking Water Well Monitoring Report," dated November 5, 2009; the "Composted Biosolids Monitoring Report" and "Compost Use Review Report," dated November 2, 2009. These reports were submitted pursuant to the Clean Water Act Section 308 Information Request letter, dated October 6, 2009.

Based on our review of the referenced reports, this office offers the following comments and requests changes (identified in *italics* below) to the report. The revised report is to be resubmitted to this office within twenty (20) days upon receipt of this letter:

1. Drinking Water Well Survey Report

- a. Page 7 of 13, paragraph 4: the determination of potentially expanding the water well survey area is limited to Dalton Utilities. The U. S. Environmental Protection Agency (EPA) and Georgia Environmental Protection Division (GA EPD) should also be included. Dalton Utilities has proposed not to expand the one mile private well sampling area, although some private wells samples were already collected beyond the one mile limit. EPA concurs with the recommendation at this time that the sampling area not be expanded, but that the issue be revisited based on results from future private well sampling. The reason for this is that the distribution of sampling results for the first quarter does not consistently show a decrease of contamination for each constituent

measured as distance increases from the facility boundary. In some cases, there is a well with a non-detect result between the facility boundary and a well with a higher analytical result. One of the highest levels of perfluorooctanesulfonic acid (PFOS) was found in a well located 1.6 miles from the facility boundary at 4496 Highway 225. Several wells between this well and the facility on North Georgia Raceway Road were non-detect for PFOS. Similarly one of the highest detections of perfluorobutanoic acid (PFBA) was found at 1585 Cagle Road approximately 2.5 miles from the facility boundary. Several private wells between this well and the facility were non-detect for PFBA. The sampling results are consistent with flow in fractured bedrock which is known to exist at this site. If sampling conducted in future quarters indicates that the plumes from the facility may still be expanding and increasing in concentration, sampling at greater distances may be required at EPA's discretion.

*Revise the report to specify that Dalton Utilities, EPA, and GA-EPD will jointly decide whether the private water well survey and sampling will be expanded in the future to address the potential for PFC contamination of private water wells outside the original 1 mile boundary.*

- b. Page 7 of 13, paragraph 11 "Follow Up Notification": Dalton Utilities should outline the procedure in which it intends to notify the residents, e.g., providing a notification letter to the residents, and a copy of the letters to EPA.

*Revise the report to include the notification procedure.*

- c. Sample location maps are not provided. Each sampling location should have a sketch of the property including the home and well location and any other important features.

*Revise the report to include a schematic (or satellite image) for each off-site compost use site including the home, the well location, and any other important features. A sketch of the lot of a half page in size should generally be adequate.*

Note: Dalton Utilities has changed laboratories from MPI to Test America for analysis of environmental samples. Changes in laboratories may make it difficult to determine the source of any variations in samples. Dalton Utilities may want to take this into consideration in any future decisions regarding laboratories.

## 2. Drinking Water Well Monitoring Report

- a. Based on the initial survey results, Dalton Utilities is required to continue sampling all eight (8) wells which results indicated PFOA and/or PFOS

above the level of quantification (LOQ), and also three (3) wells which results indicated other perfluorinated compounds (PFCs) above the LOQ. Dalton Utilities is required to monitor these 11 wells for 3 additional quarters: Sample IDs from Attachment P, November 5, 2009 submittal 9, 12, 22, 66 (resample 22), 37, 89, 90, 93, 97, 99, 104, 111, Dup 3 (resample 111).

*Revise the report to specify the above wells will be monitored quarterly for 3 quarters.*

### 3. Composted Biosolids Monitoring Plan

- a. Page 4 of 9, "Sample Collection," second paragraph: refers to excluding the sampling protocol "...if the compost inventory is thermally treated in a manner as to reduce the potential impact of PFCs to a level below the published health advisory as demonstrated through a modified Toxicity Characteristic Leaching Potential (TCLP) test..." It is unclear as to what this is in reference to.

*Please provide the scope of work, the process description of compost being thermally treated, the nature of the modification to the TCLP test and the rationale in utilizing this test as the determining factor not to include the thermally treated compost in the sampling protocol.*

*Also, revise the report to specify sample collection of 2 composited samples from each aged compost lot three times at four-month intervals.*

- b. Page 4 of 9, "Sample Collection," third paragraph, subparagraph a: refers to a five aliquot sampling protocol for the two composite samples for each different aged lots. The appropriate protocol is outlined in our October 6, 2009 Section 308 letter, Enclosure A, paragraph 8, subparagraph b, which requires 10 aliquots.

*Revise the report to specify a 10-aliquot sampling protocol for the aged compost.*

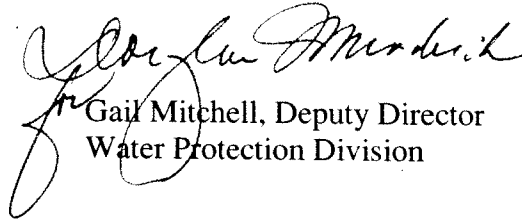
### 4. Compost Use Review Report

- a. Page 5 of 17, second paragraph, subparagraph f: the private drinking water well's latitude and longitude should be included also.

*Revise the report to specify latitudes and longitudes will be provided for private drinking water wells.*

These reports are acceptable to EPA with the requested changes. We appreciate Dalton Utilities' expeditious and ongoing implementation of these plans. If you have questions regarding this information request, please feel free to contact EPA's attorney assigned to this matter, Mr. William Bush, at (404) 562-9538.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gail Mitchell".

Gail Mitchell, Deputy Director  
Water Protection Division

cc: F. Allen Barnes, GA Environmental Protection Division  
Dr. Bert Langley, GA Environmental Protection Division Mountain District